



WISCONSIN

DEPARTMENT OF WORKFORCE DEVELOPMENT

Division of Workforce Solutions
Bureau of Workforce Programs

**TO: Economic Support Supervisors
Economic Support Lead Workers
Training Staff
Child Care Coordinators
W-2 Agencies**

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BWP OPERATIONS MEMO

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Non W-2 [X] W-2 [] CC []

PRIORITY: High

**SUBJECT: FOOD STAMP EBT DORMANCY, EXPUNGEMENT AND AGENCY
FOLLOW-UP PROCEDURES**

EFFECTIVE DATE: Immediately

PURPOSE

This memo provides:

- Information regarding a change to the dormancy policy.
- Clarification of the expungement policy.
- Follow up procedures for local agencies to ensure that customers can access their EBT (QUEST) accounts and use their Food Stamp (FS) benefits.

CHANGE TO DORMANCY POLICY

According to current policy, an EBT account becomes dormant when not accessed for 90 days. The cardholder must contact the local agency to reactivate the account. This was intended to ensure contact with food stamp recipients who were not using their Wisconsin QUEST cards.

Based on feedback from local agencies, client advocates, and others, the Department of Workforce Development (DWD) feels that the process by which accounts are deactivated and then need to be reactivated has the potential to serve as a barrier to participation, particularly among the elderly and disabled. DWD determined that the barrier potentiality outweighs any value that dormancy may have in ensuring contact with recipients. DWD is in the process of repealing the Department's authority in Administrative Rule DWD 14.24 to deactivate accounts that have not been accessed for 90 days. DWD will initiate other efforts to communicate with recipients who are not using their QUEST cards.

DWD and Citicorp Services, Inc. (CSI) have approved requirements and pricing for the removal of dormancy at 90 days of non-activity. As a new requirement, DWD requested that CSI notify CARES when an account is not accessed for 300 days. This will provide one more point for client contact before benefits are expunged. We plan to implement the dormancy change as of 9/1/01. This is contingent upon the completion of acceptance testing and minimal problems

when moving the changes to production in both systems. We will notify you on DXBM when the changes move to production.

PROCESS EFFECTIVE WITH THE DORMANCY CHANGE

1. As of the effective date of the dormancy change, CSI will change the EDA status of all dormant accounts that have not reached 365 days of non-activity from dormant to active. CSI will send a file of these cases to CARES. CARES will add a new record for each cardholder on BIET. The previous record will display "D" in the Status column. The new record will display "Y" (cardholder has access to the account) or "N" (cardholder does not have access to the account).
2. At 60 days of account non-activity, CSI will continue to send a warning indicator (W) to CARES. CARES will generate a warning letter (BIL-2) to the FS AG if the account balance is greater than \$0. The warning letter has been revised to include the account balance. The section on losing access to the account at 90 days of non-activity has been removed. The alert "NO EBT CARD USE 60 DAYS" is sent to the worker if the account balance is greater than \$0. (Previously the worker received this alert even when the account balance was \$0.) If the primary person is deceased (CARES screen ANDA - Date of Death), CARES will not generate a 60-day warning letter or alert.
3. At 90 days of account non-activity, the Electronic Deposit Account (EDA) status on the CSI system will remain active and will not change to dormant. CSI will not send a dormancy indicator (D) to CARES and CARES will not generate an alert to the worker. Since the account status is active, there will be no need for local agencies to reactivate accounts on the CSI dormant account maintenance screen.
4. At 300 days of account non-activity, CSI will send a warning indicator to CARES. CARES will generate a 300-day warning letter (BIL-3) if the account balance is over \$5. The warning letter will include the date when the account reached 300 days of non-activity, the remaining balance in the account, and the date when the account will be expunged if the account is not accessed. If the account balance is greater than \$5, the worker will get the alert "300 DAY WARNING EBT BAL > \$5". If there is an outstanding claim against the primary person and the balance is greater than \$25, the BV coordinator listed on CARES reference table TCRD will get the alert "300 DAY WARNING EBT BAL > \$25". If the primary person is deceased, CARES will not generate the 300-day warning letter or alerts.
5. At 365 days of account non-activity, CSI will change the EDA status from active to dormant. CSI will expunge (remove) all the benefits remaining in the account and send this information to CARES on the daily aging file. On the next day, CARES will add a new record for each cardholder on BIET. The record displays an "E" in the Status column for each cardholder and the date of expungement. CARES will apply the expunged benefits as an adjustment on BVCD for any outstanding claims. All remaining expunged benefits are posted on IQFS with the return reason E1. The benefit period and returned amount are displayed on IQFD. (The expungement process has not changed. Prior to removal of dormancy, the EDA status changed to dormant at 90 days of non-activity and remained dormant when expungement occurred.)
6. If CARES sends a benefit to CSI after the account is expunged, CSI will change the EDA status from dormant to active when the benefit is posted to the account. A new record is added to BIET that will display a "Y" (cardholder has access to the account) or "N" (cardholder does not have access to the account) in the Status column.

7. As of the effective date of the dormancy policy change, CSI will send a file of all cases that are currently expunged to CARES. CARES will add a new record for each cardholder on BIET. The record displays an “E” in the Status column for each cardholder and the date of expungement. CARES will not send demographic information to CSI if the current cardholder(s) has an “E” in the Status column on BIET. For example: the primary person’s name is changed. This prevents the issuance of a QUEST card when the account has been expunged and the account balance is zero. **BIET will display the current cardholders as of the expungement date.** CARES will send demographic information to CSI when a new benefit is issued and posted to the account. BIET is updated the next day and will show the cardholder change. Refer to BIET- Example 2 on page 9.
8. Reports - There are 3 EOS reports that will provide information when the dormancy change becomes effective:
 - a. CARES-BI726A-DLY – “EBT Inactive Accounts” (C068) is a daily report that provides the current balance on accounts for cases that receive a 60-day warning (W), a 300-day warning (T) or are expunged (E). This report has been in existence since the beginning of EBT implementation. The report is sorted by county and by worker. Cases with 90 days of non-activity will no longer be included on the report. In the future, the report name will be changed to “EBT Aging Report”. The report number will remain the same.
 - b. CARES-BI727A-BOM – “EBT Account Balances Over \$5 That May Be Expunged” (C099) is a monthly report that lists cases that will be expunged if the account is not accessed by the cardholder before the expungement date. The report provides case name, case number, case address, case phone number, primary person's age, cardholder names, total EBT benefits issued, the availability date of each benefit, the current amount that will be expunged and the estimated expungement date. It also identifies if there are any outstanding claims. The report is sorted by agency, by supervisory unit, by worker. Each worker's cases will be listed in the following order: FS AG open/case open; FS AG closed/case open; FS AG closed/case closed. For each category, the cases are sorted by highest to lowest account balances. The report does not include account balances of \$5 or less.

The report is produced the first business day of the month and reflects cases that have reached 300 days of non-activity in the previous month. Before the report is produced, the CSI account activity file is checked to see if there was a purchase (debit). If the account was accessed, the case is not included on the report.
 - c. CARES-BI737A-BOM – “EBT Cases That Are Expunged” is a monthly report that lists the cases that have expunged benefits. The report provides the case name, case number, case address, case phone number, primary person's age, cardholder names, total EBT benefits issued, the availability date of each benefit, the current amount that will be expunged and the expungement date. It also lists any outstanding claims. The report is sorted by agency, by supervisory unit, by worker. Each worker's cases will be listed in the following order: FS AG open/case open; FS AG closed/case open; FS AG closed/case closed. For each category, the cases are sorted by highest to lowest account balances. It is produced the first business day of the month and reflects cases that had expunged benefits in the previous month.
9. EBT Q&A Brochure: DWD will revise the EBT Questions & Answers brochure. Until it is revised, continue to provide the current Q&A brochure to FS applicants. As of the dormancy effective date, make these changes: For the question “What if I don’t want to use all my benefits in one month?”, revised the first sentence to read “The food stamp benefits you don’t use stay in your Quest card account for 365 days”. Cross out the second

sentence "If you do not use your card for 90 days, your benefits will be frozen and you must call your worker to reactivate them".

INTERIM PROCESS

Until the dormancy change is effective and CSI can send the 300-day warning indicator, CARES will calculate the 300-day date and generate the 300-day warning letters (BIL-3) and worker alerts. The alert "300 DAY WARNING EBT BAL > \$5" will go to the worker. If there are outstanding claims, the alert "300 DAY WARNING EBT BAL > \$25" will go to the BVRF "assigned worker" and the BV coordinator listed on CARES reference table TCRD. The BVRF "assigned worker" will only receive these alerts during the interim process.

A BV coordinator is not listed on TCRD for some agencies or the logon ID listed may not be current. To update the BV coordinator on table TCRD, FAX the name and logon ID of the BV Coordinator to Tom Meier, Security Help Desk, at (608) 267-0484. The signature of your agency's security officer must be included on the FAX.

We expect that the BIL-3's and alerts will be generated on the following days for cases with estimated expungements in October 2001 and November 1-4, 2001.

8/30/01	CARES cases beginning with 0 or 1
8/31/01	CARES cases beginning with 2 or 3
9/04/01	CARES cases beginning with 4 or 5
9/06/01	CARES cases beginning with 6 or 7
9/07/01	CARES cases beginning with 8 or 9

If CSI begins sending 300-day warning indicators as of 9/1/01, we will not have missed any cases that should get a BIL-3. You can view the BIL-3 for each case on CNHS. Alerts will be produced at the same time the letters are produced. If the primary person is deceased, CARES will not generate the BIL-3 and alerts.

CARES will also generate the monthly report CARES BI727A-BOM – "EBT Account Balances Over \$5 That May be Expunged". The October 2001 report will be in EOS on 8/27/01. The local agency must follow-up on cases based on the criteria identified in 3.D below. (Accounts with 300 Days of Non-activity).

If the local agency has reactivated the account through the CSI administrative terminal, this information is not known to CARES. BIET will display a "D" status for each cardholder. CARES estimates the expungement date based on the date of dormancy on BIET. The case will get a BIL-3 and be included on the report if the account balance is greater than \$5. The balance in the account and the case status will determine if you must attempt to contact the client.

EXPUNGEMENT POLICY CLARIFICATION

All food stamp benefits are expunged (removed) from the EBT account by CSI if benefits are not used within 365 days. The 365-day clock starts from the last cardholder-initiated debit or from the benefit availability date of the oldest EBT benefit if the account was never debited. On the day after expungement, CARES will apply the expunged benefits as an adjustment on BVCD for any outstanding claims. All remaining expunged benefits are posted on IQFS with the return reason E1. According to the Department of Agriculture, Food and Nutrition Service (FNS), the client is entitled to expunged benefits if the benefits are less than 365 days old. If the FS AG requests expunged benefits that are less than 365 days old, the local agency must reissue the benefits to the FS AG.

Issue an auxiliary on BIFS for each benefit returned on IQFS that is less than 365 days old. Use the IQFS issuance date to calculate the age of each benefit that has been expunged. The disposition reason for expunged benefits is E1. Use the benefit month and returned amount displayed on IQFD for each benefit when issuing an auxiliary. Use auxiliary reason 935 to restore lost benefits to an open AG. Use auxiliary reason 936 to restore benefits to a closed AG.

Example: Mary Jones was issued \$150 in EBT benefits in June 2000 and July 2000. She spent all but \$30 by the end of July, 2000. Her case closed in July 2000. She reapplied in May 2001 and was issued \$10 in EBT benefits for May and \$10 for June 2001. She did not use her QUEST card to access the account before \$50 was expunged in July 2001. The worker will issue a 935 auxiliary of \$10 for May 2001 and \$10 for June 2001.

Expunged benefits may have been applied as an adjustment to outstanding claims on BVCD. The FS AG may request to have these benefits re-issued if the benefits are less than 365 days old. If expunged benefits are re-issued, contact the DES CARES Information & Problem Resolution Center to request a system correction to delete the adjusted amount on BVCD. If the client agrees to allow the adjustment to an outstanding claim balance and not have the benefits reissued, the client must sign a FNS-135.

FS PARTICIPATION FOLLOW-UP PROCEDURES

The Joint Legislative Audit Committee reviewed the Food Stamp Program in July 2000. They recommended that the Department of Workforce Development monitor the participation of individuals in the Food Stamp Program and report on the changes in program participation among groups that may have difficulty with the EBT system, including the elderly and disabled. DWD is reviewing expungement reports and other statistical information to monitor program participation.

Local agencies must establish follow-up procedures to ensure that QUEST cardholders are able to access benefits and get help if they are having problems with the QUEST card. Document attempted contacts on CMCC or ACCC. Assist cardholders who need a replacement card or do not understand the Automated Response Unit (ARU) process to select a PIN or reach a customer service representative. The CSI ARU scripts for the client help-line and PIN selection are available on the DWD Workweb at <http://dwdworkweb/des/ebt/>.

If elderly (age 60 or older) QUEST cardholders are having difficulty using the QUEST card or calling the CSI ARU, coordinate educational opportunities with the local aging office. Provide EBT information and training material (EBT video, ARU video, Question & Answer Brochures, wallet cards, ARU scripts, etc.) to the local aging office.

APPLICATION

Ask the applicant to spend benefits on a regular basis. Discuss EBT procedures with applicants and give them the EBT Question & Answer Brochure and wallet card. If EBT benefits were issued previously, ask if the cardholder(s) still has the QUEST card. Remember that a new QUEST card is not generated if the cardholder is a current cardholder on the CSI system (BIET displays the current cardholder on the CSI system). If the client does not have the QUEST card, you can either (1) tell him/her to contact CSI customer service to request a replacement card, or (2) issue a temporary QUEST card if you deem it an emergency situation. Ask if anyone had problems using the QUEST card and assist them, if needed.

Each agency received an ARU video that can be used for client training as well as worker training. Workers should know how to assist clients to reach a customer service representative, particularly for PIN selection. The agency can assist a client in selecting or changing a PIN via a 3-way call to recipient customer service. For security purposes, the client must be included on the call. Help clients who need assistance reporting a lost/stolen or damaged card. If the cardholder states that the card is not working, staff with CSI access should review the CSI Detail Journal to determine why transactions are being denied.

ACCOUNTS WITH 60 DAYS OF NON-ACTIVITY

The local agency may require a client contact for cases if the worker gets the alert “NO EBT CARD USE 60 DAYS”. The alert and warning letter (BIL-2) is generated if the account balance is greater than \$0. The BIL-2 is generated the same day that the worker alert is generated. Check the balance in the account identified in the BIL-2 and make a determination if an additional client contact is required. At minimum, require an additional contact if the FS AG is open and none of the EBT benefits have been used. Be particularly concerned with elderly or disabled individuals or clients with language barriers that may have difficulty understanding the 60 day warning letter (BIL-2). If the cardholder states the card is not working, staff with CSI access should review the CSI Detail Journal to determine why transactions are being denied.

REVIEW OR CLIENT CONTACT

Assist cardholders that contact your agency for help with the QUEST card, selecting a PIN or reaching a CSI customer service representative. If you make a CARES cardholder change, a QUEST card is mailed to the cardholder address. Tell the cardholder that s/he must select a PIN to activate the card before it can be used.

At review (for FS or any open program), ask if the cardholder is having any problems using the QUEST card. If the cardholder states the card is not working, staff with CSI access should review the CSI Detail Journal to determine why transactions are being denied.

ACCOUNTS WITH 300 DAYS OF NON-ACTIVITY

CARES will generate a 300-day warning letter (BIL-3) if the account balance is greater than \$5.

Contact designated cases prior to the expungement date based on the following criteria. Use the monthly report CARES BI727A-BOM “EBT Account Balances Over \$5 that May be Expunged” to determine if follow-up is needed (1.A.8 above provides a description of the report). Be particularly concerned with elderly or disabled individuals or clients with language barriers that may have difficulty understanding the 300-day warning letter.

1. **FS AG Is Open:** At minimum, make a personal contact by phone or certified mail prior to the expungement date. If there is no client-initiated debit to the account, benefits that are less than 365 days old will also be expunged.
2. **Case Status Is Open/FS AG Is Closed:** At minimum, make a personal contact by phone or certified mail prior to the expungement date if the account balance is \$20 or more.
3. **Case Status Is Closed for All Programs:** Establish criteria for follow-up based on an identified minimum balance in the account. We recommend contacting cases with a balance of \$50 or more in the account. You may wish to contact cases with a smaller balance based on individual case circumstances. A contact is not needed if you do not have a current household address or phone number. You must provide assistance to cardholders that contact your agency even if the case is closed for all programs.

CONTACT

DES CARES Information and Problem Resolution Center

Email: carpolcc@dwd.state.wi.us
Phone: 608-261-6317 (Option #1)
Fax: 608-266-8358

Note: Email contacts are preferred. Thank you.

BIET EXAMPLES

Following are examples showing what BIET will look like with the dormancy policy changes.

Example #1: Maria L. Dane, the primary person, applied for FS and was confirmed on 7/20/00. Mark C. Smith was designated as the authorized representative to receive the food stamp benefit on her behalf. On 9/10/01, the worker entered BIET in the NEXT TRAN field and case number//current date in the PARMS field to see the history of all cardholder records.

History sequence 1: Maria Dane does not have access to the account (N in status column). She was not issued a QUEST card. Mark Smith has access to the account (Y in status column) and a QUEST card was ordered by CARES on 7/20/00.

History sequence 2: The account became dormant as of 11/10/01. Both Maria and Mark's records display a D in the status column.

History sequence 3: The account was changed to active with the dormancy policy change on 9/01/01. Maria Dane does not have access to the account (N in status column). Mark Smith has access to the account (Y in status column).

BIET		EBT CARDHOLDERS			09/10/01 16:30
					XCT116 J WOELFEL
CASE	PRIMARY PERSON NAME				
4100812434	DANE, MARIA L				
CARDHOLDER	STATUS	CARDHOLDER NAME	HIST SEQ	REJECTED	UPDATED DT
TYPE				IND	
PP	N	MARIA L DANE	3		2001-09-01
AP	Y	MARK C SMITH	3		2001-09-01
PP	D	MARIA L DANE	2		2001-11-10
AP	D	MARK C SMITH	2		2001-11-10
PP	N	MARIA L DANE	1		2000-07-20
AP	Y	MARK C SMITH	1		2000-07-20
NEXT TRAN: PARMS: 4100812434//091001					

The EBT account was expunged on 9/12/01. The next day, the worker entered BIET in the NEXT TRAN field and the case number in the PARMS field to get the current cardholder information.

History sequence 4 shows that both Maria and Mark's records display an E in the status column.

BIET		EBT CARDHOLDERS			09/13/01 16:31
					XCT116 J WOELFEL
CASE	PRIMARY PERSON NAME				
4100812434	DANE, MARIA L				
CARDHOLDER	STATUS	CARDHOLDER NAME	HIST SEQ	REJECTED	UPDATED DT
TYPE				IND	
PP	E	MARIA L DANE	4		2001-09-12
AP	E	MARK SMITH	4		2001-09-12
PF15 IQFS		PAGE : 01			
NEXT TRAN: ____		PARMS: 4100812434_____			

Example 2: Kim Fault applied for FS and Medicaid on 7/16/00 and was confirmed on 7/20/00. Her EBT account became dormant on 12/10/00. The account was changed to active with the dormancy policy change on 9/01/01. Her account was expunged on 9/10/01. The FS case closed but Medicaid remained open. Kim reported on 10/23/01 that her name changed to Kim Johnson. The worker changed her name on CARES on 10/23/01. The cardholder change was not sent to CSI because the account is expunged.

On 10/24/01, the worker entered BIET in the NEXT TRAN field and case number//current date in the PARMS field to see the history of all cardholder records.

History sequence 4 shows that the account was expunged on 9/10/01. There is not a new cardholder record for Kim Johnson. CARES will not send the cardholder change to CSI because the account is expunged.

BIET		EBT CARDHOLDERS			10/24/01 16:25 XCT116 J WOELFEL
CASE 0700205802	PRIMARY PERSON NAME FAULT, KIM				
CARDHOLDER TYPE	STATUS	CARDHOLDER NAME	HIST SEQ	REJECTED IND	UPDATED DT
PP	E	KIM FAULT	4		2001-09-10
PP	Y	KIM FAULT	3		2001-09-01
PP	D	KIM FAULT	2		2000-12-10
PP	Y	KIM FAULT	1		2000-07-20
NEXT TRAN: _____ PARMS: 0700205802//102401_____					

The client reapplies and was confirmed for FS on 11/21/01. CARES issues a new benefit on 11/21/01 and the benefit and cardholder change are sent to CSI on 11/21/01. BIET is updated with the new cardholder record the next day. CSI creates a new QUEST card with Kim Johnson's name and mails it to the client's benefit address. Kim must select a PIN for the new card. Her new card will then be active and the old card will be statused.

BIET		EBT CARDHOLDERS			11/22/01 16:25 XCT116 J WOELFEL	
CASE 0700205802		PRIMARY PERSON NAME FAULT, KIM				
CARDHOLDER TYPE	STATUS	CARDHOLDER NAME	HIST SEQ	REJECTED IND	UPDATED DT	
PP	Y	KIM JOHNSON	5		2001-11-21	
PP	E	KIM FAULT	4		2001-09-10	
PP	Y	KIM FAULT	3		2001-09-01	
PP	D	KIM FAULT	2		2000-12-10	
PP	Y	KIM FAULT	1		2000-07-20	
NEXT TRAN: _____ PARMS: 0700205802//112201_____						